

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:23-cr-00526-SEP
)	
ANTONIO JONES,)	
)	
Defendant.)	

DEFENDANT'S OBJECTIONS TO THE PSR

Defendant Antonio Jones, through Attorney Nicholas Williams, makes the following objections to the PSR:

Objection to Paragraphs 49, 54, 58, and 113

Mr. Jones objects to paragraphs 49, 54, 58, and 113 of the PSR. His objections all stem from the unwarranted assessment of six points in paragraph 49 for allegedly knowing or believing the laundered funds at issue were connected to controlled substance offenses. Without the six-point enhancement, Mr. Jones' adjusted offense level would be 22 (paragraph 54), his total offense level would be 19 (paragraph 58), and his guideline range would be 46-57 months (paragraph 113).

The parties did not agree to the six-point enhancement that the probation office applied in paragraph 49. Additionally, the record does not support its application, and Mr. Jones does not anticipate the presentation of any evidence that would dictate otherwise.

Accordingly, he asks that this Honorable Court sustain his objections and adopt a 46-57 month guideline range.

Objection to Paragraph 84

Mr. Jones objects to paragraph 84 of the PSR, as it alleges a gang affiliation with the Black Mafia Family. Mr. Jones categorically denies this affiliation and requests that any mention of it be stricken from his PSR.

Dated: December 23, 2024

Respectfully submitted,

/s/ Nicholas Williams

Nicholas Williams, #62617MO

1401 South Brentwood Boulevard, Suite 500

St. Louis, Missouri 63144

Phone: (314) 863-6363

Fax: (314) 727-2869

E-Mail: Nicholas.Williams@KesslerWilliams.com

Attorney for Defendant Antonio Jones

CERTIFICATE OF SERVICE

I certify that on December 23, 2024, the foregoing was filed electronically with the Clerk of the Court by operation of the Court's electronic filing system and served upon the Assistant United States Attorney.

/s/ Nicholas Williams

Nicholas Williams